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VIA ELECTRONIC MAIL

October 4, 2013

Ms. Carmen Santos
PCB Coordinator
USEPA Region 9 (WST-5)
75 Hawthorne Street
San Francisco, CA 94105

Re: Conceptual Approach to Site Sampling and Cleanup Plan
Former Westinghouse Equipment Repair Facility, Rancho Dominguez, California

Dear Ms. Santos:

CBS Corporation (CBS) and WSP Services, Inc. (WSP) have received and reviewed the U.S. Environmental Protection Agency's (USEPA) electronic mail dated August 23, 2013 requesting a Toxic Substances Control Act (TSCA) polychlorinated biphenyl (PCB) notification and cleanup plan for the former Westinghouse Equipment Repair facility in Rancho Dominguez, California. On behalf of CBS, WSP has prepared this letter to describe the conceptual approach to address the PCB issues inside the building and to obtain general concurrence from USEPA Region 9 in advance of cleanup plan preparation and submittal. CBS agrees that, based on the current condition of the property, site sampling and remediation are warranted; however, we believe that some of the provisions in the USEPA's request do not appear to be necessary based on our understanding of site conditions and the conceptual cleanup plan approach described below.

The conceptual approach to site sampling and cleanup is based on the assumption that site will continue to operate as an industrial facility and PCBs above applicable cleanup criteria may be capped or encapsulated in accordance with the TSCA regulations. Changes to the facility such as total or selective demolition, reconfiguration, expansion, or subslab excavation that may be planned in the future will need to be addressed in subsequent operation and maintenance or contingency plans.

Since receiving your request for notification and cleanup plan, CBS and WSP have engaged the property owner and have begun coordinating the pending actions on the site with the owner's tenant. The owner and tenant understand the environmental conditions of the property. They have been cooperative in providing access to the site for inspection and are supportive of the pending work.

Site Inspection

WSP conducted a thorough inspection of the interior of the warehouse building on September 12, 2013, to gather information necessary to develop the comprehensive sampling and analysis plan and cleanup plan in the interior of the building.

During the visit, WSP observed active facility operations, with raw materials and finished goods being received, stored, and shipped. The concrete floors appeared to be in good condition with few areas of residues, cracks, or spalls. Steel columns support the steel roof framing. Steel columns and trusses appeared to be painted. Several overhead pipes, ducts, and other utility lines were present along the

columns and roof trusses. Lower portions of the exterior walls consisted of painted concrete or masonry of varying heights ranging from 5 to 15 feet above the floor. Upper portions of the exterior walls consisted of painted corrugated sheet metal. Some of the paint on the corrugated sheet metal wall was peeling, but significant peeling was observed in one or two localized areas. Galbestos siding was not observed anywhere in the facility.

Two interior office/restroom/breakroom areas are present within the warehouse areas, and each has an elevated mezzanine level. The interior structures are masonry with painted surfaces. Wood partition walls were present in the interior structures and the warehouse. Ledges and flat surfaces, including the seldom used mezzanine levels, contained a significant amount of dust and residue. Vertical surfaces were relatively free of dust or residues.

The transformer pit, measuring approximately 60 feet by 20 feet by 12 feet deep, was not entered during the inspection; however, the concrete surfaces appeared to be in good condition. Oily residues were present on the concrete surfaces of the pit. A transformer and an unused storage tank, presumed to be artifacts from historical facility operations, remained in the pit.[1] A portion of the pit was covered with wood planking to create additional work space for facility operations.

The office areas on the west side of the facility were occupied. The walls were finished and floors carpeted or tiled. Drop ceilings were present in the office areas.

Cleanup Levels

In planning the interior remediation efforts, CBS proposes to use the default PCB cleanup levels prescribed in Title 40, Code of Federal Regulations (CFR) 761.61(a)(4) for porous (concrete) and non-porous (steel) surfaces for high and low occupancy areas, which are the following:

- 1 part per million (ppm) for porous surfaces in high occupancy areas
- 25 ppm for porous surfaces in low occupancy areas
- 10 micrograms per 100 square centimeters ($\mu g/100\ cm^2$) for non-porous surfaces in high occupancy areas
- 100 $\mu g/100\ cm^2$ for non-porous surfaces in low occupancy areas

For the purposes of site cleanup, CBS will consider the concrete floor (including mezzanine levels) and walls and columns to a height of 8 feet as high occupancy. Concrete associated with sumps and pits, walls and columns higher than 8 feet, and perched surfaces in the roof framing will be considered low occupancy.

By using the default cleanup levels, a risk assessment, beyond the baseline risk assessment previously prepared by WSP, may not be required for the site. Accordingly, CBS proposes to analyze collected characterization samples for Aroclor PCBs by USEPA Method 8082. Ten percent of the samples will also be analyzed for PCB congeners by USEPA Method 1668 in the event that further site-specific risk assessment is warranted.

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[1] The transformer and process tank would most likely have been left at the site by Eastern Electric, which operated the site as an apparatus repair plant after Westinghouse operations had ceased.

Indoor Air Sampling

CBS will conduct indoor air sampling to confirm that current site workers are not exposed to airborne PCBs above the guidance levels given by the National Institute of Occupational Safety and Health (NIOSH). To meet this data quality objective, up to six vapor and particulate samples, two in the office area on the west side, one in the interior structure break room, and three in the warehouse will be collected and analyzed for Aroclor PCBs by USEPA Method 8082. CBS does not see the need for analysis of PCB congeners in air samples at this time. Subsequent air sampling and analysis could be conducted if further site-specific risk assessment is warranted.

Concrete Floor including Mezzanine Levels

CBS considers the concrete floor and mezzanine levels to be high occupancy areas. Historic wipe sample results of the concrete floor exhibited PCB surface concentrations above the 10 $\mu g/100\ cm^2$ cleanup level applicable to non-porous surfaces. Based on a comparison of the wipe sample data to the available bulk concrete data, however, it does not appear that PCBs have appreciably penetrated the concrete surfaces. Accordingly, CBS proposes to clean the surface of the concrete floor following the double wash/rinse procedure described in Subpart S of 40 CFR 761. Following this cleaning, bulk samples of the concrete will be collected for PCB Aroclor analyses by USEPA Method 8280. Ten percent of the samples will also be analyzed for PCB congeners by USEPA Method 1668 in the event that further site-specific risk assessment is warranted. CBS proposes to use a 20-foot grid overlaid onto the 80,000-square foot building area, which will result in approximately 200 samples collected to adequately characterize the concrete. Bulk samples will be collected as described in the "Draft Standard Operating Procedure for Sampling Concrete in the Field," as referenced in the November 2005 USEPA guidance document, "PCB Site Revitalization Guidance Under the TSCA".

Based on the results of the bulk sampling, the following tiered approach will be considered based on evaluation of the data:

- If all of the results are less than 1 ppm[2], CBS proposes to allow continued use of the concrete surfaces without further conditions.
- If localized areas of concrete with PCB concentrations greater than 1 ppm are present, CBS may conduct "hot spot" removal via scarification of the affected areas followed by additional bulk sampling on 10-foot grid spacing. CBS will also consider complete slab removal and replacement based on the PCB concentrations.
- If the results identify widespread concentrations above 1 ppm throughout the building, CBS will consider encapsulating the surface of the floor using the procedures described in 40 CFR 761.30(p) to allow continued use of the porous surfaces for the remainder of the useful life of the concrete or removing and replacing concrete floors.

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[2] Historical bulk samples of concrete showed PCB concentrations greater than 1 ppm; however, because the sample locations were biased toward locations with elevated wipe sample results, WSP believes that the residue on the concrete may have resulted in elevated bulk concrete sample results. Sampling the concrete after cleaning will provide a better representation of the concrete that will remain.

CBS may conduct an exposure evaluation and risk assessment to potentially allow concentrations of PCBs greater than 1 ppm to remain in place. This alternative would require a deed restriction be placed on the property limiting future use to industrial activities and restricting access to the site by children under the age of 6. An example of this risk-based approach is found in the USEPA guidance document "PCB Site Revitalization Guidance Under the TSCA", dated November 2005.

Subslab Soils

Historic soils sample results do not indicate the presence of PCBs above 1 ppm below the concrete slab in the warehouse areas. Based on observation during the site visit on September 12, the concrete appeared to be in good condition with few areas of cracks or spalls. As such, CBS does not propose to collect additional soil samples below the slab. Soils below the concrete slab in the transformer pit will be capped as described below.

Concrete/Masonry Walls

CBS considers concrete/masonry exterior walls and masonry interior walls at heights less than 8 feet from the floor surface high occupancy areas and at heights greater than 8 feet from the floor surface low occupancy areas. No wipe or bulk sample data currently exist for these surfaces. As the walls are structural components of the building and cannot be removed, CBS proposes to collect wipe samples to characterize the concrete/masonry wall surfaces. If the wipe samples indicate PCB concentrations above the high occupancy cleanup level on surfaces less than 8 feet from a floor surface or above the low occupancy cleanup level on surfaces greater than 8 feet from a floor surface, the surfaces will be decontaminated using the double wash rinse procedure and encapsulated in accordance with the use authorization in 40 CFR 761.30(p).

Pits and Sumps

The pits/sumps are not used by the current tenant of the property. CBS considers the pits and sumps to be low occupancy areas as facility workers do not enter the pits at frequencies greater than 6 hours per week. Based on historical data, PCBs are not present in the concrete or soil below the concrete at concentrations above 100 ppm (highest PCB concentration in soil is 51 ppm). As such, CBS proposes to backfill the pits/sumps with soil or flowable fill and construct a concrete cap over the pits and sumps that meets the requirements of 40 CFR 761.61(a)(7).

Non-porous Surfaces

Non-porous surfaces are located throughout facility. These surfaces are represented by columns, roof trusses, crane rails, sheet metal walls, utility pipes, hand railings, and other miscellaneous structures. CBS considers non-porous surfaces at heights less than 8 feet from the floor surface high occupancy areas and at heights greater than 8 feet from the floor surface low occupancy areas. No wipe sample data currently exist for the non-porous surfaces.

Based on site inspection, the flat non-porous surfaces contain an accumulation of dust. CBS proposes to collect a limited number of bulk dust samples and wipe samples of non-porous surfaces to determine PCB content. If the results of this limited sampling do not indicate widespread exceedences of high and low occupancy cleanup criteria, CBS proposes to perform site-wide characterization of non-porous surfaces in accordance with Subpart P of 40 CFR 761. If the results indicate widespread exceedences of the high and low occupancy cleanup criteria, CBS proposes to perform site-wide decontamination of

non-porous surfaces using the double wash rinse procedure described in Subpart S of 40 CFR 761 followed by verification sampling in accordance with Subpart P of 40 CFR 761.

Former Railroad Spur

The former railroad spur area was remediated via excavation using a cleanup level of 0.3 mg/kg total PCBs. USEPA was involved in the review and decision-making process for this work and concurred with the cleanup approach. The 0.3 mg/kg cleanup goal was achieved in all areas except for inaccessible areas (beneath building footers) and areas encroaching on the Union Pacific property. Except for potentially affected soil on the Union Pacific property, CBS does not propose collecting additional soil samples or performing additional remediation related to the former rail spur.

CBS has made numerous attempts to access the Union Pacific property for investigation and potential remedial purposes. The indemnification requirements set forth by Union Pacific's terms and conditions for access exposes CBS to unacceptable and unreasonable risk. CBS anticipates that USEPA intervention will be necessary to obtain access for additional sampling and remediation if necessary.

Conclusion

CBS believes that the conceptual plan described herein is fully protective of human health and the environment. We propose to schedule a meeting by conference call during the week of October 7, 2013 to discuss this approach, identify any needed refinements, and obtain USEPA concurrence on the conceptual approach for facility decontamination. After receipt of USEPA concurrence, CBS and WSP will develop the notification and cleanup plan in concert with the Department of Toxic Substances Control's requirements for site closure.

Please let us know your availability for the week of October 7, 2013. In the meantime, if you have any questions or would like to discuss the planned approach, CBS and WSP can be available at your convenience.

Sincerely yours,

David A. Rykaczewski
Senior Technical Manager

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